

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1 <i>et al.</i> , Plaintiffs, v. GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS, <i>et al.</i> , Defendants.	Case Number: 23-cv-10301-AS
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**CECILE DE JONGH’S NOTICE OF JOINDER WITH/INCORPORATION OF
CO-DEFENDANTS’ DISPOSITIVE MOTIONS**

Cecile de Jongh, by and through undersigned counsel, submits this Notice pursuant to Rules 12(b)(1), 12(b)(2), 12(b)(3), 12(b)(5), and 12(b)(6) of the Federal Rules of Civil Procedure, to dismiss all claims in the Second Amended Complaint, and incorporates in her own Motion to Dismiss and to Strike (being filed simultaneously with this Notice), including but not limited to Ms. Plaskett’s Motion to dismiss (ECF Nos. 117, 118) and Mr. de Jongh Jr.’s Motion to dismiss (ECF No. 120), to the extent not raised in Ms. de Jongh’s own Motion, or to the extent other defendants’ motions further brief(s) and expand(s) upon issues raised in Ms. de Jongh’s Motion.

The Second Amended Complaint has numerous deficiencies that provide ample grounds for dismissal as to all Defendants in this case. And it’s necessary for Ms. de Jongh’s Motion to Dismiss to address more specific allegations that the Second Amended Complaint has raised as to her and her alone. As a former employee of Mr. Epstein’s—she was his office manager from 2000 to 2019, and First Lady for only eight of those years between 2007 and 2015—there are

additional allegations and issues it is necessary for her to address that are not applicable to any of the other defendants in this case.

Undersigned counsel is similarly mindful of the Court's caution that "longer briefs are usually worse briefs" and that counsel "should make every effort to file a concise brief[.]" Dkt. No. 52. Moreover, courts in this District have accepted notices of joinder in motions to dismiss without requiring additional motion practice. *See, e.g., Mills v. Alphabet Inc.*, No. 16-CV-4669 (VSB), 2018 WL 1569838, at *3 (S.D.N.Y. Mar. 28, 2018); *In Re Methyl Tertiary Butyl Ether ("MTBE") Prod. Liab. Litig.*, No. 14 CIV. 6228 (VSB), 2021 WL 3371938, at *20 (S.D.N.Y. Aug. 3, 2021); *Pope v. Rice*, No. 04 CIV. 4171 (DLC), 2005 WL 613085, at *5 (S.D.N.Y. Mar. 14, 2005).

Accordingly, rather than move for additional pages to brief Ms. de Jongh's Motion, Ms. de Jongh respectfully joins in the other defendants' motions, including but not limited to Ms. Plaskett's Motion to dismiss (ECF Nos. 117, 118) and Mr. de Jongh Jr.'s Motion to dismiss (ECF No. 120), and incorporates by reference all arguments into her own Motion, to the extent they apply to Ms. de Jongh, and to the extent those arguments are not already made in her own Motion, as if raised and stated in her own Motion.¹

DATED: July 3, 2024



Amelia J. Schmidt

¹ Ms. de Jongh's Non-Argumentative Chart, submitted as an exhibit to her Motion pursuant to Rule 8.G(i) of this Court's Individual Practices, likewise reflects and incorporates the arguments raised in the other defendants' motions pursuant to Fed. R. Civ. P. 12(b)(6). Ms. de Jongh similarly joins in and incorporates those positions as set forth in the Government's Non-Argumentative Chart (Dkt. No. 68-1) and Mr. de Jongh Jr. Non-Argumentative Charts (Dkt. No. 31-5).